

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CAO GROUP, INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, and  
UNINCORPORATED ASSOCIATES  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

**Case No.: 1:24-cv-01211**

**Judge Thomas M. Durkin**

**Magistrate Judge Jeannice W.  
Appenteng**

**JURY TRIAL DEMAND**

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT  
AS TO CERTAIN DEFENDANTS**

Pursuant to Fed. R. Civ. P. 55(b)(2) and this Court’s Local Rules, Plaintiff CAO Group, Inc. (“Plaintiff”) respectfully moves this Court to enter Default and Default Judgment in its favor and against all Defendants remaining in this action, with the exception of Defendant Nos. 4) DEEPSOUND, 5) BYS Technology, 8) GD-Whitening, 10) Carbonline, 23) Moose Store, 26) BLUE ELF, 27) Acupress, 36) homefromgoods, 48) PureSell, 64) Gaoxi E -commerce Co. Ltd, and 65) ANCRV,<sup>1</sup> for the relief requested in Plaintiff’s Amended Verified Complaint [19] for the Count I (patent infringement of U.S. Patent No. 10,603,259), Count II (patent infringement of U.S. Patent No. 10,646,419 ), and Count III (patent infringement of U.S. Patent No. 1,219,582). In support of this motion, Plaintiff files herewith a Brief in Support.

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<sup>1</sup> The identified and excepted Defendants requested an extension of time to respond to Plaintiff’s Verified Amended Complaint [19], with the exception of Defendant No. 8) GD-Whitening who filed a Motion to Dismiss and for which a briefing schedule has been entered.

Date: May 23, 2024

Respectfully submitted,

/s/ Sameeul Haque

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*Counsel for Plaintiff, CAO Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2024, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system and I, or someone at my instruction, will send an email to the email addresses identified in Exhibit A hereto that includes this document and all other relevant documents.

/s/ Sameeul Haque  
Sameeul Haque